

GEORGE S. SAVA george@portandsava.com

USDC SDNY DOCUMENT ELECTRONICALLY FILED **DATE FILED:** 06/23/2025

June 19, 2025

APPLICATION GRANTED 06/23/2025

Re: Perpetual Ashare v. Sontag & Hyman, P.C. et. al.

Docket No.: 1:25-cv-02834-GHW-KHP

Joint Request for Leave to File Answer Out of Time

Dear Judge Parker:

We write jointly on behalf of both the Plaintiff Perpetual Ashare's counsel and Defendant Richman Property Services Inc.'s counsel, in the above-captioned matter to respectfully request that the Court permit Defendant Richman Property Services Inc., to interpose an answer to the Plaintiff's complaint to July 3, 2025.

Due to miscommunication between the parties as to the responsive period for the Answer, the Defendant requires an additional two (2) weeks to respond to the Complaint. The response time for the Answer was June 17, 2025, but through the miscommunication, the Defendant's counsel believed there was additional time. This is the first request for an extension. The parties have conferred, and the Plaintiff's counsel consents to the extension.

Accordingly, the parties respectfully request that the Court grant Defendant leave to file an answer to the complaint on or before July 3, 2025.

This request is made in good faith and not for the purpose of delay. Granting the requested relief will not prejudice any party, and we believe it will promote the orderly progression of the case.

We thank the Court for its attention to this matter.

Respectfully submitted,

George S. Sava, Esq.

Port & Sava

Attorneys for the Defendant Richman 303 Merrick Road, Suite 212

Lynbrook, NY 11563 (516) 352-2999

george@portandsava.com

/S/

Ahmad Keshavarz, Esq. Law Office of Ahmad Keshavarz Attorney for the Plaintiff 16 Court Street, Suite 2600 Brooklyn, NY 11241-1026 (347) 308-4859 ahmad@newyorkconsumerattorney.com

CC: All parties via ECF

REPLY TO:

303 MERRICK ROAD SUITE 212 LYNBROOK NEW YORK 11563 T: (516)-352-2999 F: (516) 352-3933

LAW OFFICE OF GARY PORT, P.C., D//B/A PORT & SAVA